

ROB BONTA, State Bar No. 202668  
Attorney General of California  
EMILIO VARANINI, State Bar No. 163952  
KARLI EISENBERG, State Bar No. 281923  
Supervising Deputy Attorneys General  
DAVID HOUSKA, State Bar No. 295918  
Deputy Attorney General  
455 Golden Gate Ave.  
Suite 11000  
San Francisco, CA 94102  
E-mail: david.houska@doj.ca.gov  
*Attorneys for Defendant Rob Bonta, in his official  
capacity as Attorney General of the State of  
California*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

**ASSOCIATION FOR ACCESSIBLE  
MEDICINES,**

Plaintiff,

**v.**

**ROB BONTA, IN HIS OFFICIAL  
CAPACITY AS ATTORNEY GENERAL  
OF THE STATE OF CALIFORNIA,**

Defendant.

2:20-cv-01708-TLN-DB

**STIPULATION AND ORDER  
MODIFYING DISCOVERY DEADLINES**

Plaintiff Association for Accessible Medicines (“Plaintiff”) and Defendant Rob Bonta, in his official capacity as Attorney General of the State of California (“Defendant”), hereby stipulate and agree as follows:

WHEREAS, Defendant has served discovery on Plaintiff and five member companies of Plaintiff (the member companies the “Third Parties”);

WHEREAS, Defendant, Plaintiff, and the Third Parties have met, conferred, and reached an agreement regarding the scope of discovery that resolved all current outstanding disputes between them, without the need for motion practice or intervention by the Court (Dkt. No. 58);

1 WHEREAS, discovery is currently set to close on Friday April 7, motions for Summary  
2 Judgment are due on June 2, oppositions to motions for summary judgment are due on July 28, and  
3 replies are due on August 25 (Dkt. No. 49);

4 WHEREAS, some of the Third Parties have encountered technical difficulties in making  
5 their production that will prevent them from meeting the existing discovery deadlines, and do not  
6 expect to be able to resolve those technical difficulties for several weeks;

7 WHEREAS, the Parties wish to extend the discovery deadline and ensuing deadlines for  
8 briefing on motions for summary judgment in order to accommodate the Third Parties;

9 WHEREAS, this is the first request by the Parties to extend or otherwise modify the  
10 discovery deadlines;

11 WHEREAS, no trial has been scheduled in this action, and no hearing or other date set by  
12 the Court will be effected by the proposed schedule change

13 NOW THEREFORE, IT IS STIPULATED AND AGREED THAT:

14 (1) The close of fact discovery should be extended from April 7 until May 31, 2023;

15 (2) The deadline for filing any motion for summary judgment, including any motion to  
16 convert the existing preliminary injunction into a final judgment; should be extended from June 2  
17 to July 31, 2023;

18 (3) The deadline for any opposition to a motion for summary judgment should be extended  
19 from July 28 to September 22, 2023;

20 (4) The deadline for any reply to a motion for summary judgment should be extended from  
21 August 25 to October 20, 2023.

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23 IT IS SO STIPULATED.  
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1 Dated: April 7, 2023

Respectfully Submitted,

2 ROB BONTA  
3 Attorney General of California  
4 EMILIO VARANINI  
5 KARLI EISENBERG  
6 Supervising Deputy Attorneys General

7 /s/ David Houska  
8 DAVID HOUSKA  
9 Deputy Attorney General  
10 *Attorneys for Defendant Rob Bonta, in his*  
11 *official capacity as Attorney General of the*  
12 *State of California*

13 /s/ Michael Shipley  
14 MICHAEL SHIPLEY (Cal. Bar #  
15 233674)  
16 KIRKLAND & ELLIS LLP  
17 555 South Flower Street  
18 Los Angeles, CA 90071  
19 (213) 680-8348

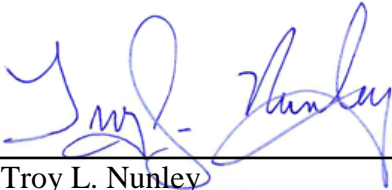
20 ALEXANDRA I. RUSSELL (*pro hac*  
21 *vice*)  
22 KIRKLAND & ELLIS LLP  
23 1301 Pennsylvania Avenue NW  
24 Washington, DC 20004  
25 (202) 389-5258  
26 alexandra.russell@kirkland.com

27 JAY P. LEFKOWITZ (*pro hac vice*)  
28 KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
(212) 446-4800  
lefkowitz@kirkland.com

*Counsel for Plaintiff Association  
for Accessible Medicines*

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: April 6, 2023

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Troy L. Nunley  
United States District Judge